

# **EXHIBIT C**

**Ex. C – Parties’ Factual Stipulation for Trial**  
***Freeman v. Giuliani, 24-cv-6563 (S.D.N.Y.)***

**I. Stipulated Facts Drawn From ECF No.57**

Paragraph #	ECF No. 46	ECF No. 57
1	<p>In February 2010, Defendant, and his then-wife bought a condo located at 315 South Lake Drive, Unit 5D, Palm Beach, Florida (the “Palm Beach Condo”). Declaration of Rudolph W. Giuliani (“Giuliani Decl.”) ¶ 3; Giuliani Decl. Exhibit A. In January 2020, as part of a divorce distribution, Defendant became the sole owner of the Palm Beach Condo. Giuliani Decl. ¶ 4; Giuliani Decl. Exhibit B.</p>	<p>Response: Undisputed.</p>
2	<p>In July 2023, Defendant entered into a contract with Sotheby’s International Realty, engaging Sotheby’s to sell his New York apartment. Giuliani Decl. ¶¶ 5-6; Giuliani Decl. Exhibit C. Once the New York Apartment was sold, the Palm Beach Condo would be Defendant’s only residence. Giuliani Decl. ¶ 7.</p>	<p>Response: Undisputed that Defendant engaged Sotheby’s to sell his New York apartment. Otherwise, Plaintiffs lack sufficient information to admit, dispute, or otherwise evaluate these assertions or the evidence offered in support without discovery. <i>See</i> Declaration of Aaron E. Nathan Pursuant to Federal Rule of Civil Procedure 56(d) (“Rule 56(d) Declaration”) ¶¶ 3-5. As of March 13, 2024, counsel for Defendant Giuliani stated that Defendant was “<i>in the process</i> of working with Sotheby’s in connection with listing the debtor’s Manhattan property” and had “<i>just</i> actually received the proposed listing agreement.” ECF. No. 163 at 12:15-22, <i>In re Giuliani</i>, 23-12055-shl (Bankr. S.D.N.Y. Apr. 10, 2024) (emphasis added).</p>

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7	On July 13, 2024, Defendant made a declaration of Florida domicile, which was then recorded in the office of the Clerk of Palm Beach County. Giuliani Decl. ¶ 14; Giuliani Decl. Exhibit H.	Response: Undisputed.
12	Defendant was also in other cities for business. For example, he covered the Republican National Convention in Milwaukee, Wisconsin, and he broadcasted from Paris, France, during the summer Olympics. Giuliani Decl. ¶ 16.	Response: Undisputed that Defendant visited the locations mentioned but otherwise, Plaintiffs lack sufficient information to admit, dispute, or otherwise evaluate these assertions or the evidence offered in support of these assertions without discovery. <i>See</i> Rule 56(d) Declaration ¶ 5.
14	On Monday, February 12, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America’s Mayor Live (E341): Who is Arseniy Petrovych Yatsenyuk?” <i>See</i> Declaration of David Labkowski, Esq. (“Labkowski Decl.”) ¶ 5.	Response: Undisputed that Defendant broadcasted from that location on that date.
15	On Tuesday, February 13, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America’s Mayor Live (E342): LIVE RESULTS—New York 3rd Congressional District Special Election.” <i>See</i> Labkowski Decl. ¶ 6.	Response: Undisputed that Defendant broadcasted from that location on that date.
16	On Wednesday, February 14, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America’s Mayor Live (E343): LIVE UPDATES—Shooting in Kansas City, Missouri at the Super Bowl Parade.” <i>See</i> Labkowski Decl. ¶ 7.	Response: Undisputed that Defendant broadcasted from that location on that date.
17	On Thursday, February 15, 2024, Defendant broadcasted live from Boynton Beach, Florida, an episode entitled “America’s Mayor Live (E344): Fani Willis & Nathan Wade on Trial.” <i>See</i> Labkowski Decl. ¶ 8.	Response: Undisputed that Defendant broadcasted from that location on that date.
18	On Monday, February 19, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America’s Mayor Live (E346): Biden Administration Continues to Capitulate on the Global Stage.” <i>See</i> Labkowski Decl. ¶ 9.	Response: Undisputed that Defendant broadcasted from that location on that date.

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19	On Tuesday, February 20, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America’s Mayor Live (E347): The War on Gender.” <i>See</i> Labkowski Decl. ¶ 10.	Response: Undisputed that Defendant broadcasted from that location on that date.
20	On Wednesday, February 21, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America’s Mayor Live (E348): Joe Biden’s Brother, James Biden, Testifies Behind Closed Doors.” <i>See</i> Labkowski Decl. ¶ 11.	Response: Undisputed that Defendant broadcasted from that location on that date.
21	On Thursday, February 22, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America’s Mayor Live (E349): Democrat “Russian Collusion” Hoax 2.0.” <i>See</i> Labkowski Decl. ¶ 12.	Response: Undisputed that Defendant broadcasted from that location on that date.
22	On Friday, February 23, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America’s Mayor Live (E350): ELECTION 2024—The South Carolina Primary.” <i>See</i> Labkowski Decl. ¶ 13.	Response: Undisputed that Defendant broadcasted from that location on that date.
23	On Monday, February 26, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America’s Mayor Live (E351): ELECTION 2024—Previewing Michigan’s Presidential Primary.” <i>See</i> Labkowski Decl. ¶ 14.	Response: Undisputed that Defendant broadcasted from that location on that date.
24	On Wednesday, February 28, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America’s Mayor Live (E353): Our Southern Border is Facing an INVASION.” <i>See</i> Labkowski Decl. ¶ 15.	Response: Undisputed that Defendant broadcasted from that location on that date.
25	On Thursday, February 29, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America’s Mayor Live (E354): President Trump & Joe Biden’s Southern Border Visits—Compare & Contrast.” <i>See</i> Labkowski Decl. ¶ 16.	Response: Undisputed that Defendant broadcasted from that location on that date.
26	On Friday, March 1, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America’s Mayor Live (E355): Joe Biden & Democrat Open-Border Policies Caused Laken Riley’s Death.” <i>See</i> Labkowski Decl. ¶ 17.	Response: Undisputed that Defendant broadcasted from that location on that date.
27	On Monday, March 4, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America’s Mayor Live (E356): Supreme	Response: Undisputed that Defendant broadcasted from that location on that date.

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	Court Rules Unanimously in President Donald Trump's Favor." <i>See</i> Labkowski Decl. ¶ 18.	
28	On Tuesday, March 5, 2024, Defendant broadcasted live from New York, New York, an episode entitled "America's Mayor Live (E357): ELECTION 2024—Super Tuesday." <i>See</i> Labkowski Decl. ¶ 19.	Response: Undisputed that Defendant broadcasted from that location on that date.
29	On Wednesday, March 6, 2024, Defendant broadcasted live from New York, New York, an episode entitled "America's Mayor Live (E358): The REAL Reason Nikki Haley Dropped Out of the Race." <i>See</i> Labkowski Decl. ¶ 20.	Response: Undisputed that Defendant broadcasted from that location on that date.
30	On Thursday, March 7, 2024, Defendant broadcasted live from New York, New York, an episode entitled "America's Mayor Live (E359): The 2024 State of the Union Address." <i>See</i> Labkowski Decl. ¶ 21.	Response: Undisputed that Defendant broadcasted from that location on that date.
31	On Monday, March 11, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled "America's Mayor Live (E361): Breaking Down Joe Biden's \$7.3 TRILLION Budget." <i>See</i> Labkowski Decl. ¶ 22.	Response: Undisputed that Defendant broadcasted from that location on that date.
32	On Tuesday, March 12, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled "America's Mayor Live (E362): The Israeli–Palestinian conflict." <i>See</i> Labkowski Decl. ¶ 23.	Response: Undisputed that Defendant broadcasted from that location on that date.
35	On Friday, March 15, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled "America's Mayor Live (E365): The Dangers of Staying Silent in the Face of Injustice." <i>See</i> Labkowski Decl. ¶ 26.	Response: Undisputed that Defendant broadcasted from that location on that date.
36	On Monday, March 18, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled "America's Mayor Live (E366): Biden Removes "Duty, Honor, Country" from West Point Mission Statement." <i>See</i> Labkowski Decl. ¶ 27.	Response: Undisputed that Defendant broadcasted from that location on that date.
37	On Tuesday, March 19, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled "America's Mayor Live (E367): EU & The West Blast Russian Elections, but Silent on Trump Persecution." <i>See</i> Labkowski Decl. ¶ 28.	Response: Undisputed that Defendant broadcasted from that location on that date.

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38	On Wednesday, March 20, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America’s Mayor Live (E368): Biden-World PANICS as President Trump Leads Virtually Every Poll.” <i>See</i> Labkowski Decl. ¶ 29.	Response: Undisputed that Defendant broadcasted from that location on that date.
39	On Thursday, March 21, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America’s Mayor Live (E369): ELECTION 2024—America at a Crossroads.” <i>See</i> Labkowski Decl. ¶ 30.	Response: Undisputed that Defendant broadcasted from that location on that date.
40	On Friday, March 22, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America’s Mayor Live (E370): Gunman Kill at Least 40 People Inside Moscow Concert Hall.” <i>See</i> Labkowski Decl. ¶ 31.	Response: Undisputed that Defendant broadcasted from that location on that date.
41	On Monday, March 25, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America’s Mayor Live (E371): Appeals Court Rules Against Judge Engoron in Phony Fraud Case YET AGAIN.” <i>See</i> Labkowski Decl. ¶ 32.	Response: Undisputed that Defendant broadcasted from that location on that date.
42	On Tuesday, March 26, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America’s Mayor Live (E372): Bridge COLLISION/COLLAPSE in Baltimore—Sign of Decaying Infrastructure?” <i>See</i> Labkowski Decl. ¶ 33.	Response: Undisputed that Defendant broadcasted from that location on that date.
43	On Wednesday, March 27, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America’s Mayor Live (E373): Feds Search Sean ‘Diddy’ Combs’ Properties in Sex Trafficking Probe.” <i>See</i> Labkowski Decl. ¶ 34.	Response: Undisputed that Defendant broadcasted from that location on that date.
44	On Thursday, March 28, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America’s Mayor Live (E374): Donald Trump Honors Fallen Officer; Biden Hosts High-Dollar Fundraiser.” <i>See</i> Labkowski Decl. ¶ 35.	Response: Undisputed that Defendant broadcasted from that location on that date.
46	On Monday, April 1, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America’s Mayor Live (E376): America is Lost—2024 is about Fighting to take it Back.” <i>See</i> Labkowski Decl. ¶ 37.	Response: Undisputed that Defendant broadcasted from that location on that date.

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47	On Tuesday, April 2, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America’s Mayor Live (E377): Justice for All.” <i>See</i> Labkowski Decl. ¶ 38.	Response: Undisputed that Defendant broadcasted from that location on that date.
48	On Wednesday, April 3, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America’s Mayor Live (E378): The Democrat Party’s Bizarre War Against Law Enforcement.” <i>See</i> Labkowski Decl. ¶ 39.	Response: Undisputed that Defendant broadcasted from that location on that date.
49	On Thursday, April 4, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America’s Mayor Live (E379): NEW POLL—Trump Leads Biden in Six of Seven Swing States.” <i>See</i> Labkowski Decl. ¶ 40.	Response: Undisputed that Defendant broadcasted from that location on that date.
50	On Friday, April 5, 2024, Defendant broadcasted live from New Hampshire, an episode entitled “America’s Mayor Live (E380): Earthquake Rattles New York City.” <i>See</i> Labkowski Decl. ¶ 41.	Response: Undisputed that Defendant broadcasted from that location on that date.
51	On Tuesday, April 9, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America’s Mayor Live (282): Our Experience with the Solar Eclipse from New Hampshire.” <i>See</i> Labkowski Decl. ¶ 42.	Response: Undisputed that Defendant broadcasted from that location on that date.
52	On Wednesday, April 10, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America’s Mayor Live (383): What to Make of the Chants of “Death to America” in Dearborn, Michigan.” <i>See</i> Labkowski Decl. ¶ 43.	Response: Undisputed that Defendant broadcasted from that location on that date.
53	On Thursday, April 11, 2024, Defendant broadcasted live from Tulsa, Oklahoma, an episode entitled “America’s Mayor Live (384): The Fall of New York City & How the Giuliani Playbook Can Spur a Revival.” <i>See</i> Labkowski Decl. ¶ 44.	Response: Undisputed that Defendant broadcasted from that location on that date.
54	On Friday, April 12, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America’s Mayor Live (385): Exclusive Report Warns of Imminent Attack by Iran.” <i>See</i> Labkowski Decl. ¶ 45.	Response: Undisputed that Defendant broadcasted from that location on that date.
55	On Monday, April 15, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America’s Mayor Live (E386): Biden	Response: Undisputed that Defendant broadcasted from that location on that date.

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	Regime Goes ALL-IN on Dystopian Election Interference vs. Trump.” <i>See</i> Labkowski Decl. ¶ 46.	
56	On Tuesday, April 16, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America’s Mayor Live (E387): The Consequences of the Left’s Weaponization of the U.S. Justice System.” <i>See</i> Labkowski Decl. ¶ 47.	Response: Undisputed that Defendant broadcasted from that location on that date.
57	On Wednesday, April 17, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America’s Mayor Live (E388): Democrats Vote to Continue Alien Invasion.” <i>See</i> Labkowski Decl. ¶ 48.	Response: Undisputed that Defendant broadcasted from that location on that date.
58	On Thursday, April 18, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America’s Mayor Live (E389): Restricting Trump to Campaigning in New York will BACKFIRE on Democrats.” <i>See</i> Labkowski Decl. ¶ 49.	Response: Undisputed that Defendant broadcasted from that location on that date.
59	On Friday, April 19, 2024, Defendant broadcasted live from New Hampshire, an episode entitled “America’s Mayor Live (E390): Is Mike Johnson Relying on Democrats to Save Job as Speaker?” <i>See</i> Labkowski Decl. ¶ 50.	Response: Undisputed that Defendant broadcasted from that location on that date.
60	On Monday, April 22, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America’s Mayor Live (E391): Mayor Rudy Giuliani visits Harvard University.” <i>See</i> Labkowski Decl. ¶ 51.	Response: Undisputed that Defendant broadcasted from that location on that date.
61	On Tuesday, April 23, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America’s Mayor Live (E392): Mayor Rudy Giuliani visits Columbia University.” <i>See</i> Labkowski Decl. ¶ 52.	Response: Undisputed that Defendant broadcasted from that location on that date.
62	On Wednesday, April 24, 2024, Defendant broadcasted live from Staten Island, New York, an episode entitled “America’s Mayor Live (E393): Exposing the Truth on the College Protesters.” <i>See</i> Labkowski Decl. ¶ 53.	Response: Undisputed that Defendant broadcasted from that location on that date.
63	On Thursday, April 25, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America’s Mayor Live (E394): Supreme Court Appears Open to Partial Immunity for POTUS.” <i>See</i> Labkowski Decl. ¶ 54.	Response: Undisputed that Defendant broadcasted from that location on that date.

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64	On Monday, April 29, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America’s Mayor Live (396): Protesters at Harvard Replace American Flag with Palestinian Flag.” <i>See</i> Labkowski Decl. ¶ 55.	Response: Undisputed that Defendant broadcasted from that location on that date.
65	On Tuesday, April 30, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America’s Mayor Live (397): The Stunning Lack of Leadership at These So-Called Elite Universities.” <i>See</i> Labkowski Decl. ¶ 56.	Response: Undisputed that Defendant broadcasted from that location on that date.
66	On Wednesday, May 1, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America’s Mayor Live (398): The Fall of the Ivy League Institutions.” <i>See</i> Labkowski Decl. ¶ 57.	Response: Undisputed that Defendant broadcasted from that location on that date.
67	On Thursday, May 2, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America’s Mayor Live (399): NEW POLL—Trump Widens Gap Over Biden.” <i>See</i> Labkowski Decl. ¶ 58.	Response: Undisputed that Defendant broadcasted from that location on that date.
68	On Monday, May 6, 2024, Defendant broadcasted live from South Florida, an episode entitled “America’s Mayor Live (401): American Injustice.” <i>See</i> Labkowski Decl. ¶ 59.	Response: Undisputed that Defendant broadcasted from that location on that date.
69	On Tuesday, May 7, 2024, Defendant broadcasted live from Miami, an episode entitled “America’s Mayor Live (402): What Cuban-Americans can teach us about Socialism.” <i>See</i> Labkowski Decl. ¶ 60.	Response: Undisputed that Defendant broadcasted from that location on that date.
70	On Wednesday, May 8, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America’s Mayor Live (403): Game Over for Special Counsel Jack Smith & Classified Documents Case.” <i>See</i> Labkowski Decl. ¶ 61.	Response: Undisputed that Defendant broadcasted from that location on that date.
71	On Thursday, May 9, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America’s Mayor Live (404): Judge Merchan’s Conflicts & Conduct Should Immediately Disqualify Him.” <i>See</i> Labkowski Decl. ¶ 62.	Response: Undisputed that Defendant broadcasted from that location on that date.
72	On Friday, May 10, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America’s Mayor Live (405): The Importance of Fighting Against Censorship in America.” <i>See</i> Labkowski Decl. ¶ 63.	Response: Undisputed that Defendant broadcasted from that location on that date.

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73	On Sunday, May 12, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “Uncovering the Truth (E1): Sunday, May 12, 2024.” <i>See</i> Labkowski Decl. ¶ 64.	Response: Undisputed that Defendant broadcasted from that location on that date.
74	On Monday, May 13, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “The Rudy Giuliani Show: Shocking NEW Evidence of Election Fraud that WABC Doesn’t Want You to See.” <i>See</i> Labkowski Decl. ¶ 65.	Response: Undisputed that Defendant broadcasted from that location on that date.
75	On Monday, May 13, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America’s Mayor Live (406): Michael Cohen Perjures Himself.” <i>See</i> Labkowski Decl. ¶ 66.	Response: Undisputed that Defendant broadcasted from that location on that date.
77	On Tuesday, May 14, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America’s Mayor Live (E407): The Truth About Michael Cohen.” <i>See</i> Labkowski Decl. ¶ 68.	Response: Undisputed that Defendant broadcasted from that location on that date.
78	On Wednesday, May 15, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “The Rudy Giuliani Show (E3): Michael Cohen’s Former Attorney Bob Costello Exposes Cohen’s Lies.” <i>See</i> Labkowski Decl. ¶ 69.	Response: Undisputed that Defendant broadcasted from that location on that date.
79	On Wednesday, May 15, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America’s Mayor Live (E408): Bob Costello Exposes Michael Cohen in EXPLOSIVE Congressional Hearing.” <i>See</i> Labkowski Decl. ¶ 70.	Response: Undisputed that Defendant broadcasted from that location on that date.
80	On Thursday, May 16, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “The Rudy Giuliani Show (E4): Why is Joe Biden Suddenly Eager to Debate?” <i>See</i> Labkowski Decl. ¶ 71.	Response: Undisputed that Defendant broadcasted from that location on that date.
81	On Thursday, May 16, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America’s Mayor Live (E409): Michael Cohen’s Former Attorney: “He Told Me He Had Nothing On Trump”.” <i>See</i> Labkowski Decl. ¶ 72.	Response: Undisputed that Defendant broadcasted from that location on that date.
82	On Friday, May 17, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “The Rudy Giuliani Show (E5): It Looks Like Michael Cohen Just Committed Perjury Again.” <i>See</i> Labkowski Decl. ¶ 73.	Response: Undisputed that Defendant broadcasted from that location on that date.

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83	On Friday, May 17, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America’s Mayor Live (E410): Celebrating a Great American Life.” <i>See</i> Labkowski Decl. ¶ 74.	Response: Undisputed that Defendant broadcasted from that location on that date.
84	On Sunday, May 19, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “Uncovering the Truth (E2): Sunday, May 19, 2024.” <i>See</i> Labkowski Decl. ¶ 75.	Response: Undisputed that Defendant broadcasted from that location on that date.
85	On Monday, May 20, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “The Rudy Giuliani Show (E6): Michael Cohen Admits to STEALING \$60,000 from Trump Organization.” <i>See</i> Labkowski Decl. ¶ 76.	Response: Undisputed that Defendant broadcasted from that location on that date.
86	On Monday, May 20, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America’s Mayor Live (E411): “This case is dead. It was dead on arrival” - Fmr Michael Cohen Advisor.” <i>See</i> Labkowski Decl. ¶ 77.	Response: Undisputed that Defendant broadcasted from that location on that date.
87	On Tuesday, May 21, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “The Rudy Giuliani Show (E7): Arizona—The Grand Canyon State.” <i>See</i> Labkowski Decl. ¶ 78.	Response: Undisputed that Defendant broadcasted from that location on that date.
88	On Tuesday, May 21, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America’s Mayor Live (E412): Arizona—The Grand Canyon State.” <i>See</i> Labkowski Decl. ¶ 79.	Response: Undisputed that Defendant broadcasted from that location on that date.
89	On Wednesday, May 22, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “The Rudy Giuliani Show (E8): Biden Losing More and More Voters to “Uncommitted”.” <i>See</i> Labkowski Decl. ¶ 80.	Response: Undisputed that Defendant broadcasted from that location on that date.
90	On Thursday, May 23, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “The Rudy Giuliani Show (E9): President Trump Campaigns in the Bronx.” <i>See</i> Labkowski Decl. ¶ 81.	Response: Undisputed that Defendant broadcasted from that location on that date.
91	On Friday, May 24, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “The Rudy Giuliani Show (E10): President Trump RALLIES in the Bronx.” <i>See</i> Labkowski Decl. ¶ 82.	Response: Undisputed that Defendant broadcasted from that location on that date.

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92	On Friday, May 24, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America’s Mayor Live (E415): President Trump’s MASSIVE RALLY in the Bronx.” <i>See</i> Labkowski Decl. ¶ 83.	Response: Undisputed that Defendant broadcasted from that location on that date.
93	On Sunday, May 26, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “Uncovering the Truth (E3): Sunday, May 26, 2024.” <i>See</i> Labkowski Decl. ¶ 84.	Response: Undisputed that Defendant broadcasted from that location on that date.
94	On Monday, May 27, 2024, Defendant broadcasted live from New York, New York, an episode entitled “The Rudy Giuliani Show (E11): Memorial Day—Honoring America’s Fallen Heroes.” <i>See</i> Labkowski Decl. ¶ 85.	Response: Undisputed that Defendant broadcasted from that location on that date.
95	On Monday, May 27, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America’s Mayor Live (E416): The History of Memorial Day— Honoring America’s Fallen Heroes.” <i>See</i> Labkowski Decl. ¶ 86.	Response: Undisputed that Defendant broadcasted from that location on that date.
96	On Tuesday, May 28, 2024, Defendant broadcasted live from New York, New York, an episode entitled “The Rudy Giuliani Show (E12): In Bizarre Move, Democrats Use Robert De Niro in Trump Trial Response.” <i>See</i> Labkowski Decl. ¶ 87.	Response: Undisputed that Defendant broadcasted from that location on that date.
97	On Tuesday, May 28, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America’s Mayor Live (E417): Closing Arguments in President Trump’s New York Trial.” <i>See</i> Labkowski Decl. ¶ 88.	Response: Undisputed that Defendant broadcasted from that location on that date.
98	On Wednesday, May 29, 2024, Defendant broadcasted live from New York, New York, an episode entitled “The Rudy Giuliani Show (E13): A Glaring Problem w/ New York Trial.” <i>See</i> Labkowski Decl. ¶ 89.	Response: Undisputed that Defendant broadcasted from that location on that date.
99	On Wednesday, May 29, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America’s Mayor Live (E418): Jury Begins Deliberations in New York Trial.” <i>See</i> Labkowski Decl. ¶ 90.	Response: Undisputed that Defendant broadcasted from that location on that date.
100	On Thursday, May 30, 2024, Defendant broadcasted live from New York, New York, an episode entitled “The Rudy Giuliani Show (E14): Jury Deliberations Continue in New York Trial.” <i>See</i> Labkowski Decl. ¶ 91.	Response: Undisputed that Defendant broadcasted from that location on that date.

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101	On Thursday, May 30, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America’s Mayor Live (E419): Reaction to Guilty Verdict in President Trump’s New York Trial.” <i>See</i> Labkowski Decl. ¶ 92.	Response: Undisputed that Defendant broadcasted from that location on that date.
102	On Thursday, May 30, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America’s Mayor Live (E419): Reaction to Guilty Verdict in President Trump’s New York Trial.” <i>See</i> Labkowski Decl. ¶ 93.	Response: Undisputed that Defendant broadcasted from that location on that date.
103	On Friday, May 31, 2024, Defendant broadcasted live from New York, New York, an episode entitled “The Rudy Giuliani Show (E15): Breaking Down the Most Disgraceful & Illicit Trial in American History.” <i>See</i> Labkowski Decl. ¶ 94.	Response: Undisputed that Defendant broadcasted from that location on that date.
104	On Sunday, June 2, 2024, Defendant broadcasted live from New York, New York, an episode entitled “Uncovering the Truth (E4): American Injustice.” <i>See</i> Labkowski Decl. ¶ 95.	Response: Undisputed that Defendant broadcasted from that location on that date.
105	On Monday, June 3, 2024, Defendant broadcasted live from New York, New York, an episode entitled “The Rudy Giuliani Show (E16): Illegal Immigrant SHOOTS Two NYPD Officers in Brazen Attack.” <i>See</i> Labkowski Decl. ¶ 96.	Response: Undisputed that Defendant broadcasted from that location on that date.
106	On Monday, June 3, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America’s Mayor Live (E421): Hunter Biden Trial Day 1—Jury Selected; Opening Statements on Tuesday.” <i>See</i> Labkowski Decl. ¶ 97.	Response: Undisputed that Defendant broadcasted from that location on that date.
107	On Tuesday, June 4, 2024, Defendant broadcasted live from New York, New York, an episode entitled “The Rudy Giuliani Show (E17): Joe Biden’s Executive Order on Border an Election Year Gimmick.” <i>See</i> Labkowski Decl. ¶ 98.	Response: Undisputed that Defendant broadcasted from that location on that date.
108	On Tuesday, June 4, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America’s Mayor Live (E422): Hunter Biden Trial Day 2—Opening Statements, First Witness Takes Stand.” <i>See</i> Labkowski Decl. ¶ 99.	Response: Undisputed that Defendant broadcasted from that location on that date.

## II. **Stipulated Facts Drawn From ECF No. 45**

Paragraph #	ECF No. 30 Statement	ECF No. 45 Statement
1	Plaintiff Ruby Freeman is a resident and citizen of Georgia. <i>See Freeman v. Giuliani</i> , No. 21-cv-3354 (D.D.C. January 11, 2024), ECF No. 146 at 98:7–8; 104:16–19.	Response: Admitted.
2	Plaintiff Wandrea’ ArShaye “Shaye” Moss is a resident and citizen of Georgia. <i>See Freeman v. Giuliani</i> , No. 21-cv-3354 (D.D.C. January 11, 2024), ECF No. 154 at 25:18–21; 59:7–15.	Response: Admitted.
4	Mr. Giuliani owns two apartments: (1) a co-op apartment at 45 East 66th Street in New York, New York (the “New York Apartment”), and (2) a condominium apartment at 315 South Lake Drive, Unit 5D, Palm Beach, Florida (the “Palm Beach Condo”). <i>See Declaration of Maggie MacCurdy in Support of Plaintiffs’ Motion for Summary Judgment (“MacCurdy Decl.”), ¶ 3, Exhibit B.</i>	Response: Admitted.
5	Initially owned by Mr. Giuliani and his ex-wife, Judith, Mr. Giuliani has been the sole owner of the Palm Beach Condo since January 14, 2020. <i>See MacCurdy Decl. ¶ 7, Exhibit F.</i>	Response: Admitted.
8	On June 17, 2024, Mr. Giuliani was in New York, and was not at the Palm Beach Condo. <i>See Declaration of Regina Scott in Support of Plaintiffs’ Motion for Summary Judgment (“Scott Decl.”), ¶ 7, Exhibit 2.</i>	Response: Admitted.
9	On June 18, 2024 and June 19, 2024, Mr. Giuliani broadcast episodes of <i>The Rudy Giuliani Show</i> and <i>America’s Mayor Live</i> in unidentified locations. <i>See Scott Decl. ¶¶ 8–12, Exhibits 3, 4, 5, and 6.</i>	Response: Admitted.
10	On June 20, 2024, Mr. Giuliani was in New Hampshire, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶¶ 13–15, Exhibits 7 and 8.</i>	Response: Admitted.
11	On June 21, 2024, was in New Hampshire, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶ 16, Exhibit 9.</i>	Response: Admitted.
12	On June 24, 2024, Mr. Giuliani was in New Hampshire, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶ 17, Exhibit 10.</i>	Response: Admitted.
13	On June 25 2024, Mr. Giuliani was in New Hampshire, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶ 18, Exhibit 11.</i>	Response: Admitted.
14	On June 26, 2024, Mr. Giuliani was in New Hampshire, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶ 19, Exhibit 12.</i>	Response: Admitted.

Paragraph #	ECF No. 30 Statement	ECF No. 45 Statement
15	On June 27, 2024, Mr. Giuliani was in New Hampshire, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶ 20, Exhibit 13.</i>	Response: Admitted.
16	On June 28, 2024, Mr. Giuliani was in New Hampshire, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶ 21, Exhibit 14.</i>	Response: Admitted.
17	On July 1, 2024, Mr. Giuliani was in New Hampshire, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶ 22, Exhibit 15.</i>	Response: Admitted.
18	On July 2, 2024, Mr. Giuliani was in New Hampshire, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶¶ 23–25, Exhibits 16–17.</i>	Response: Admitted.
19	On July 3, 2024, Mr. Giuliani was in New Hampshire, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶¶ 26–28, Exhibits 18–19.</i>	Response: Admitted.
20	On July 4, 2024, Mr. Giuliani was in New Hampshire, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶¶ 29–31, Exhibits 20–21.</i>	Response: Admitted.
21	On July 5, 2024, Mr. Giuliani was in New Hampshire, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶¶ 32–34, Exhibits 22–23.</i>	Response: Admitted.
22	On July 8, 2024, Mr. Giuliani was in New Hampshire, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶ 35, Exhibit 24.</i>	Response: Admitted.
23	On July 9, 2024, Mr. Giuliani was in New Hampshire, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶¶ 36–38, Exhibits 25–26.</i>	Response: Admitted.
24	On July 10, 2024, Mr. Giuliani was in New Hampshire, and was not at the Palm Beach Condo. <i>e. See Scott Decl. ¶¶ 39–41, Exhibits 27–28.</i>	Response: Admitted.
25	On July 11, 2024, Mr. Giuliani was in New Hampshire, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶¶ 42–44, Exhibits 29–30.</i>	Response: Admitted.
26	On July 12, 2024, Mr. Giuliani was in New Hampshire, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶ 45, Exhibit 31.</i>	Response: Admitted.
27	On July 13, 2024, Mr. Giuliani was in New Hampshire, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶¶ 45–46, Exhibits 31–32.</i>	Response: Admitted.
28	Mr. Giuliani traveled directly from New Hampshire to Wisconsin via La Guardia airport in New York, and on July 14, 2024, Mr. Giuliani was in Milwaukee, Wisconsin, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶ 46, Exhibit 32.</i> ....	Response: Admitted.

Paragraph #	ECF No. 30 Statement	ECF No. 45 Statement
29	On July 15, 2024, Mr. Giuliani was in Milwaukee, Wisconsin, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶ 47, Exhibit 33.</i>	Response: Admitted.
30	On July 16, 2024, Mr. Giuliani was in Milwaukee, Wisconsin, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶ 48, Exhibit 34.</i>	Response: Admitted.
31	On July 17, 2024, Mr. Giuliani was in Milwaukee, Wisconsin, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶ 49, Exhibit 35.</i>	Response: Admitted.
32	On July 18, 2024, Mr. Giuliani was in Milwaukee, Wisconsin, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶ 50, Exhibit 36.</i>	Response: Admitted.
33	On July 19, 2024, Mr. Giuliani was in Milwaukee, Wisconsin, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶¶ 51–52, Exhibits 37–38.</i>	Response: Admitted.
34	Mr. Giuliani returned from Milwaukee to New Hampshire, not to the Palm Beach Condo, and on July 22, 2024, Mr. Giuliani was in New Hampshire, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶ 53, Exhibit 39.</i>	Response: Admitted.
35	On July 23, 2024, Mr. Giuliani was in New Hampshire, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶¶ 54–56, Exhibits 40–41.</i>	Response: Admitted.
36	On July 24, 2024, Mr. Giuliani was in New Hampshire, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶¶ 57–59, Exhibits 42–43.</i>	Response: Admitted.
37	On July 25, 2024, Mr. Giuliani was in New Hampshire, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶¶ 60–62, Exhibits 44–45.</i>	Response: Admitted.
38	On July 27, 2024 Mr. Giuliani was in Paris, France, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶ 63, Exhibit 46.</i>	Response: Admitted.
39	On July 29, 2024, Mr. Giuliani was in the United Kingdom, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶ 64, Exhibit 47.</i>	Response: Admitted.
40	On August 1, 2024, Mr. Giuliani was in Paris, France, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶ 65, Exhibit 48.</i>	Response: Admitted.
41	Mr. Giuliani returned from Paris to New Hampshire, not to the Palm Beach Condo, and on August 2, 2024 Mr. Giuliani was in New Hampshire, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶ 66, Exhibit 49.</i>	Response: Admitted.
42	On August 5, 2024 Mr. Giuliani was in New Hampshire, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶ 67, Exhibit 50.</i>	Response: Admitted.
43	On August 6, 2024 Mr. Giuliani was in New Hampshire, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶¶ 68–70, Exhibits 51–52.</i>	Response: Admitted.

Paragraph #	ECF No. 30 Statement	ECF No. 45 Statement
44	On, August 7, 2024, Mr. Giuliani was in New Hampshire, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶ 71, Exhibit 53.</i>	Response: Admitted.
45	On, August 8, 2024, Mr. Giuliani was in New Hampshire, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶¶ 72–74, Exhibits 54–55.</i>	Response: Admitted.
46	On, August 9, 2024, Mr. Giuliani was in New Hampshire, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶¶ 75–77, Exhibits 56–57.</i>	Response: Admitted.
47	Mr. Giuliani traveled directly from New Hampshire to Texas, and on August 12, 2024, Mr. Giuliani was in Dallas, Texas, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶ 78, Exhibit 58.</i>	Response: Admitted.
48	On August 13, 2024, Mr. Giuliani was in Dallas, Texas, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶ 79, Exhibit 59.</i>	Response: Admitted.
49	Mr. Giuliani returned from Texas to New Hampshire, and on August 14, 2024, Mr. Giuliani was in New Hampshire, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶ 80, Exhibit 60.</i>	Response: Admitted.
50	On August 15, 2024, Mr. Giuliani was in New Hampshire, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶¶ 81–83, Exhibits 61–62.</i>	Response: Admitted.
51	On August 16, 2024, Mr. Giuliani was in New Hampshire, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶ 84, Exhibit 63.</i>	Response: Admitted.
52	Mr. Giuliani traveled directly from New Hampshire to Chicago, and on August 19, 2024, Mr. Giuliani was in Chicago, Illinois, and not at the Palm Beach Condo. <i>See Scott Decl. ¶ 85, Exhibit 64.</i>	Response: Admitted.
53	On August 20, 2024, Mr. Giuliani was in Chicago, Illinois, and not at the Palm Beach Condo. <i>See Scott Decl. ¶ 86, Exhibit 65.</i>	Response: Admitted.
54	On August 21, 2024, Mr. Giuliani was in Chicago, Illinois, and not at the Palm Beach Condo. <i>See Scott Decl. ¶ 87, Exhibit 66.</i>	Response: Admitted.
55	On August 22, 2024, Mr. Giuliani was in Chicago, Illinois, and not at the Palm Beach Condo. <i>See Scott Decl. ¶ 88, Exhibit 67.</i>	Response: Admitted.
56	On August 23, 2024, Mr. Giuliani was in Chicago, Illinois, and not at the Palm Beach Condo. <i>See Scott Decl. ¶¶ 89–92, Exhibits 68–70.</i>	Response: Admitted.
57	Mr. Giuliani returned directly from Chicago to New Hampshire, and on August 26, 2024, Mr. Giuliani was in New Hampshire, and was not at the Palm Beach Condo. <i>See Scott Decl. ¶¶ 93–95, Exhibits 71–72.</i>	Response: Admitted.

Paragraph #	ECF No. 30 Statement	ECF No. 45 Statement
58	On August 27, 2024, Mr. Giuliani was in New Hampshire, and was not at the Palm Beach Condo. <i>See Scott Decl.</i> ¶¶ 96–98, Exhibits 73–74.	Response: Admitted.
59	On August 28, 2024, Mr. Giuliani was in New Hampshire, and was not at the Palm Beach Condo. <i>See Scott Decl.</i> ¶ 99, Exhibit 75.	Response: Admitted.
60	On August 29, 2024, Mr. Giuliani was in New Hampshire, and was not at the Palm Beach Condo. <i>See Scott Decl.</i> ¶¶ 100–102, Exhibits 76–77.	Response: Admitted.
61	Mr. Giuliani did not actually occupy the Palm Beach Condo between June 17, 2024 and August 29, 2024. <i>See Scott Decl.</i> ¶¶ 7–102, Exhibits 2–77.	Response: Admitted.
62	Mr. Giuliani was not actually present at the Palm Beach Condo at all between June 17, 2024, and August 29, 2024. <i>See Scott Decl.</i> ¶¶ 7–102, Exhibits 2–77.	Response: Admitted.
63	Mr. Giuliani did not actually occupy and was not actually present at the Palm Beach Condo between July 1, 2024 and August 8, 2024. <i>See Scott Decl.</i> ¶¶ 22–74, Exhibits 15–55.	Response: Admitted.
64	On July 15, 2024, Mr. Giuliani filed an “affidavit of domicile” with the Clerk of Palm Beach County, Florida. MacCurdy Decl. ¶ 5, Exhibit D. Mr. Giuliani executed the affidavit on July 13, 2024, in New Hampshire, and the affidavit was notarized by a New Hampshire notary. <i>See MacCurdy Decl.</i> ¶ 5, Exhibit D. At the time the affidavit was executed, Mr. Giuliani was physically present in New Hampshire. <i>See Scott Decl.</i> ¶ 45, Exhibit 31.	Response: Admitted.
66	On December 21, 2023, Mr. Giuliani filed a Chapter 11 Voluntary Petition for bankruptcy in the Bankruptcy Court for the Southern District of New York. <i>See MacCurdy Decl.</i> ¶ 2, Exhibit A.	Response: Admitted.